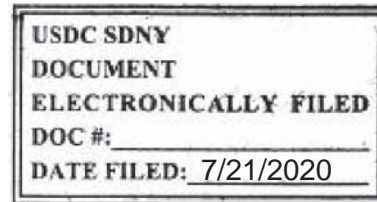




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July 10, 2020



**BY CM/ECF**

Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007-1581

Re: *Blue Ocean International Bank LLC v. Golden Eagle Capital Advisors, Inc.*, 19 CV 09327 (AJN)

Your Honor:

This letter-motion is submitted jointly by Plaintiff Blue Ocean International Bank LLC ("Plaintiff") and Defendant Golden Eagle Capital Advisors, Inc. ("Defendant") (jointly, the "Parties"). Pursuant to Local Civil Rule 83.9, and for the reasons set forth below in greater detail, the Parties hereby inform the Court of their desire to mediate this dispute at this time. They therefore request: (1) referral of the case to the Mediation Program for the U.S. District Court for the Southern District of New York (the "Mediation Program") and (2) a stay of all proceedings for at least 60 days for purposes of mediation.

Over the past two months, the Parties have exchanged their respective initial disclosures, initial requests for production of documents and interrogatories, and initial responses and objections thereto. Under the Civil Case Management Plan entered by the Court on May 1, 2020 (Docket No. 37), depositions are to be completed by August 3, 2020, all fact discovery is to be completed by August 10, 2020, and all expert discovery is to be completed by September 24, 2020. However, based on the discovery exchanged to date and discussions between the

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undersigned counsel, the Parties believe that a more efficient use of the Court's and the Parties' resources at this stage would be for the Parties to explore the possibility of settlement without having to devote time and money to litigation while settlement discussions are ongoing.

In particular, the Parties believe that confidential settlement discussions facilitated by a mediator would be helpful in this case. Accordingly, they hereby request referral of the case to the Mediation Program.

The Parties also request a stay of all proceedings for at least 60 days for purposes of mediation. A stay would allow the Parties to discuss and produce any additional documents and information they believe are essential for purposes of mediation and thereafter engage in settlement discussions while, importantly, saving resources that could be used to implement a possible settlement.

In sum, the Parties hereby request: (1) referral of this case to the Mediation Program and (2) an order staying all proceedings for at least 60 days for purposes of mediation.

Thank you for your attention.

Respectfully submitted,

s/Roberto C. Quiñones-Rivera

Roberto C. Quiñones-Rivera

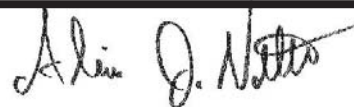
*Attorney for Defendant*

s/Steven D. Isser

Steven D. Isser

*Attorney for Plaintiff*

By separate order, the Court will refer the parties to this District's mediation program. All discovery deadlines are hereby stayed in the interim. The case management conference scheduled for September 25, 2020 is hereby adjourned sine die. If mediation is unsuccessful, the parties are directed to advise the Court and submit a revised case management plan for the Court's review.



7/20/20